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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 ARGONAUT MIDWEST INSURANCE
13 COMPANY, a Nebraska Corporation,

14 Plaintiff,

15 v.

16 YOU MOVE WE MOVE, INC., a Nevada
17 Corporation, ALFONSO PEREZ-GARCIA, a
18 Nevada resident, JOSE DE JESUS IBARRA, a
19 Nevada resident, DOES 1-20, DOE
CORPORATIONS 1-20,

20 Defendants.

21 Case No.: 2:25-cv-00376 -CDS-NJK

22 **STIPULATION AND PROPOSED
ORDER TO SET ASIDE CLERK'S
DEFAULT**

23 Plaintiff ARGONAUT MIDWEST INSURANCE COMPANY ("Plaintiff") and Defendants
ALFONSO PEREZ-GARCIA and JOSE DE JESUS IBARRA ("Defendants") stipulate as follows:

24 1. The clerk's default entered against Defendant ALFONSO PEREZ-GARCIA on June 18, 2025
[ECF No. 15] will be set aside.
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26 2. The clerk's default entered against Defendant JOSE DE JESUS IBARRA on June 18, 2025
[ECF No. 16] will be set aside.
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